

February 7, 2002

Paul Burns
A.F. Wolke Paint Company, Inc.
723 Quarry Road
Corydon, Indiana 47112

Dear Paul Burns:

Re: Exempt Construction and Operation Status,
061-15495-00024

The application from A.F. Wolke Paint Company, Inc., received on January 25, 2002, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following three storage tanks, to be located at 723 Quarry Road in Corydon, Indiana, is classified as exempt from air pollution permit requirements:

- (a) Tank 1, designated as EU-07, with a capacity of 3000 gallons, storing coating material.
- (b) Tank 2, designated as EU-08, with a capacity of 3000 gallons, storing coating material.
- (c) Tank 3, designated as EU-09, with a capacity of 3000 gallons, storing resin material.

These three storage tanks will be in addition to the other equipment currently existing at the source. The source has been classified as Permit by Rule. This exemption is an addition to that Permit by Rule source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

drp

cc: File - Harrison County
Harrison County Health Department
Air Compliance - Ray Schick
Permit Tracking - Janet Mobley
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name: A.F. Wolke Paint Company, Inc.
Source Location: 723 Quarry Road, Corydon, Indiana 47112
County: Harrison
SIC Code: 2851
Operation Permit No.: 061-15495-00024
Permit Reviewer: drpoole

The Office of Air Quality (OAQ) has reviewed an application from A.F. Wolke Paint Company, Inc. relating to the construction and operation of three storage tanks. The tanks will be waterborne bake enamel and a polymer resin.

Permitted Emission Units and Pollution Control Equipment

The source operates under the Permit by Rule.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units

Tank 1, designated as EU-07, with a capacity of 3000 gallons, storing coating material.

Tank 2, designated as EU-08, with a capacity of 3000 gallons, storing coating material.

Tank 3, designated as EU-09, with a capacity of 3000 gallons, storing resin material.

Justification for the Exemption

The facilities being added to this Permit by Rule source are classified as exempt.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on January 25, 2002.

Emission Calculations

See Appendix A of this document for detailed emissions calculations, pages 1 through 4.

Potential To Emit of Exemption Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	1.6
PM-10	1.6
SO ₂	-
VOC	3.5
CO	-
NO _x	-

HAP's	Potential To Emit (tons/year)
Ethylene Glycol	0.3
TOTAL	0.3

- a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, these storage tanks are subject to the provisions of 326 IAC 2-1.1-3.

County Attainment Status

The source is located in Harrison County.

Pollutant	Status
PM-10	unclassifiable
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Harrison County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Harrison County has been classified as attainment or unclassifiable for PM-10, SO₂,

NO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Facility Status

New Facilities PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	1.6
PM ₁₀	1.6
SO ₂	-
VOC	3.5
CO	-
NO _x	-
Single HAP	0.3
Combination HAPs	0.3

- (a) These new facilities are **not** at a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Proposed Exemption

PTE from the proposed exemption (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM ₁₀ (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Exemption	1.6	1.6	-	3.5	-	-
PSD Threshold Level	250	250	250	250	250	250

This exemption to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

These new facilities at an existing Permit by Rule source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 20 and 40 CFR Parts 61 and 63) applicable to this source.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of these three storage tanks will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 8-1-6 (New facilities; general reduction requirements)

The VOC emissions for each of the storage tanks is less than 25 tons per year. Therefore, this rule does not apply.

Conclusion

The construction and operation of these three storage tanks at a Permit by Rule source shall be subject to the conditions of the attached proposed Exemption 061-15495-00024.

Increased Production

VOC emission increase based upon a factor used in permit 11222:

$$(9.57 \text{ lb/gal})(4000 \text{ gal/month})(30 \text{ lb VOC/ton production})(1 \text{ ton/2000 lb})(12 \text{ month/yr})(1 \text{ ton/2000 lb}) = 3.45 \text{ ton VOC/yr}$$

VOC emission increase based upon AP-42 Section 6.4 factor:

$$(2.79 \text{ lb VOC/gal})(4000 \text{ gal/month})(12 \text{ month/yr})(1 \text{ ton/2000 lb})(0.02 \text{ VOC loss}) = 1.3 \text{ ton VOC/yr}$$

PM emission increase based upon AP-42 Section 6.4 factor:

$$([9.57 - 2.79] \text{ lb PM/gal})(4000 \text{ gal/month})(12 \text{ month/yr})(1 \text{ ton/2000 lb})(0.01 \text{ PM loss}) = 1.62 \text{ ton PM/yr}$$

Worst case HAP

$$(9.57 \text{ lb/gal})(0.066 \text{ lb HAP/lb})(4000 \text{ gal/month})(12 \text{ month/yr})(1 \text{ ton/2000 lb})(0.02 \text{ VOC loss}) = 0.30 \text{ ton HAP/yr}$$